

Public Comments on Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges:
Consumer Information and Disclosure; Truth-in-Billing and Billing Format:=====

Title: Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges: Consumer
Information and Disclosure; Truth-in-Billing and Billing Format

FR Document Number: 2011-21547

Legacy Document ID:

RIN:

Publish Date: 8/23/2011 12:00:00 AM

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I'm writing this letter as chief operating officer of daData and Servicing Solutions Group, mid-sized companies located in Florida that employ approximately 50 people. The organizations that I represent provide products and support services to numerous companies, many of which bill consumers to their home phones via third party billing.

We applaud your efforts to protect consumers from phone bill cramming. However, we also strongly believe that third- party billing services provide great value to businesses and consumers alike, and that these services must be preserved in any new rules that are implemented for the industry.

Thousands of businesses across the nation see first-hand the benefits of third- party billing, including the ability to reduce administrative costs and consolidate charges for services onto a single bill. Additionally, millions of consumers each year are able to acquire a broader array of services at more competitive rates, with a billing option that does not require them to open an additional line of credit or manage yet another bill.

As a result of third-party billing services, companies like those of our clients have been able to offer customers a flexible and hassle-free billing option that saves them time and money, which has helped us remain competitive in an increasingly challenging market. Banning third-party billing would unnecessarily harm businesses like ours, as well as those we serve.

daData and Servicing Solutions Group support your important goal of protecting consumers from cramming. However, we believe that this is best achieved through the implementation of reasonable measures, not through an outright ban of a service that is valued by millions of consumers and is a driver of growth for thousands of businesses. As you consider applying the rules in your Notice for Proposed Rulemaking, we urge you to consider the financial impact they would have across the country.

Joseph Marinucci, Chief Operating